

ORIGINAL



0000021549

MEMORANDUM

30A

TO: Docket Control

FROM: Ernest G. Johnson  
Director  
Utilities Division

EA for EGJ

Arizona Corporation Commission

**DOCKETED**

JUN 14 2005

DATE: **June 14, 2005**

DOCKETED BY	
-------------	--

RE: STAFF REPORT FOR ARIZONA ELECTRIC POWER COOPERATIVE, INC.'S  
APPLICATION FOR FINANCING AUTHORIZATION.  
(DOCKET NO. E-01773A-04-0793)

This amended staff report is the same as the previously docketed staff report except the correct date of the report has been inserted above on this memorandum page. No other changes have been made in this staff report.

Attached is the Staff Report for Arizona Electric Power Cooperative, Inc.'s application for financing authorization.

Staff recommends contingent approval.

EGJ:AXR:cal

Originator: Alejandro Ramirez

Attachment: Original and thirteen copies

AZ CORP COMMISSION  
DOCUMENT CONTROL

2005 JUN 14 P 3:24

RECEIVED

Service List for: Arizona Electric Power Cooperative, Inc.  
Docket No. E-01773A-04-0793

Arizona Electric Power Cooperative, Inc  
P.O Box 670  
Benson, Arizona, 85602

Mr. Michael M. Grant  
Todd C. Wiley  
2575 East Camelback Road  
Phoenix, AZ 85016

Christopher C. Kempley, Esq., Chief Counsel  
Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Ernest G. Johnson, Esq., Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Lyn Farmer, Esq., Chief Administrative Law Judge  
Hearing Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

**STAFF REPORT  
UTILITIES DIVISION  
ARIZONA CORPORATION COMMISSION**


**ARIZONA ELECTRIC POWER COOPERATIVE, INC.  
DOCKET NO. E-01773A-04-0793**

**APPLICATION FOR FINANCING AUTHORIZATION**

**JUNE 2005**

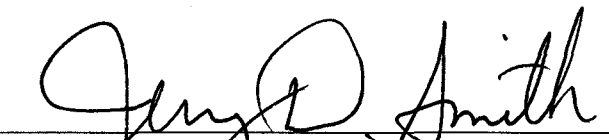
## STAFF ACKNOWLEDGMENT

The Staff Report for Arizona Electric Power Cooperative, Inc., Docket No. E-01773A-04-0793 was the responsibility of the Staff members listed below. Alejandro Ramirez was responsible for the financial review and analysis. Jerry Smith was responsible for the engineering and technical analysis.



---

ALEJANDRO RAMIREZ  
PUBLIC UTILITIES ANALYST III



---

JERRY SMITH  
UTILITIES ENGINEER (ELECTRICAL)

## **EXECUTIVE SUMMARY**

Arizona Electric Power Cooperative, Inc. ("AEPCO" or "Applicant") is a non-profit electric generation cooperative that supplies all or most of the power needs of its five Arizona Class A member distribution cooperatives.

On November 4, 2004, AEPCO filed an application with the Arizona Corporation Commission ("Commission") requesting authorization to issue long-term debt in an amount not to exceed \$4.9 million from the National Rural Utilities Cooperative Finance Corporation ("CFC") , to issue interim financing from the CFC in an amount not to exceed \$3.5 million, and to issue its subsequent permanent financing in an amount not to exceed \$3,050,000 from the Federal Financing Bank ("FFB").

On July 23, 2004, the Applicant filed a rate application (Docket No. E-01773A-04-0528).

The purpose of the proposed long-term CFC loan is to finance the closure of the inactive combustion waste disposal facility at Apache Station. The purpose of the proposed FFB loan is to finance the construction of a new low volume wastewater pond.

AEPCO's current rates are not sufficient to service the proposed loans debt payments. The proposed/recommended revenues (the Applicant and Staff agree on the revenue requirement) in its rate case (Docket No. E-01773A-04-0528) are sufficient to service the new debt AEPCO is requesting authorization to incur. Accordingly, Staff's recommendation is contingent upon the Commission's approval of the Applicant's proposed revenues.

The Applicant's capital structure after the proposed CFC and FFB loans would be composed of 6.3 percent short-term debt, 89.9 percent long-term debt, and 3.8 percent equity. The proposed/recommended revenues in the rate case and incurrence of AEPCO's proposed \$4,900,000 CFC loan and \$3,050,000 FFB loan would produce a times interest earned ratio of 1.54 and a debt service ratio of 1.01.

Staff concludes that the purposes of the proposed debt are lawful and issuance of the debt is within AEPCO's corporate powers. However, due to AEPCO's excessively leverage capital structure, issuance of this debt is only compatible with sound financial practices that will not impair its ability to provide public service if the proposed/recommended revenues in the rate case are adopted and if AEPCO adopts a plan to improve its capital structure in the near future.

Staff recommends approval of AEPCO's request for financing authorization contingent upon the Commission's approval of the proposed/recommended rate case revenues and also subject to the Applicant committing to adopt a plan concurrent with its rate case to improve its capital structure by increasing the patronage equity portion to at least 30 percent.

## **TABLE OF CONTENTS**

	<b><u>PAGE</u></b>
INTRODUCTION .....	1
NOTICE .....	1
BACKGROUND .....	1
PURPOSE OF THE FINANCING .....	1
ENGINEERING ANALYSIS .....	2
DESCRIPTION OF PROPOSED FINANCING .....	2
FINANCIAL ANALYSIS .....	2
COMPLIANCE .....	3
CONCLUSION AND RECOMMENDATIONS.....	3

## **SCHEDULES**

FINANCIAL ANALYSIS .....	AXR-1
--------------------------	-------

## **Attachments**

Engineering Report .....	Attachment 1
Proof of Notice .....	Attachment 2

## **Introduction**

On November 4, 2004, Arizona Electric Power Cooperative, Inc. ("AEPCO" or "Applicant") filed an application with the Arizona Corporation Commission ("Commission") requesting authorization to borrow an amount not to exceed \$4.9 million from the National Rural Utilities Cooperative Finance Corporation ("CFC") to finance the closing of an inactive combustion waste disposal facility. In addition, the Applicant requests approval of interim financing from the CFC in an amount not to exceed \$3.5 million and subsequent permanent financing in an amount not to exceed \$3,050,000 from the Federal Financing Bank ("FFB") to finance the construction of a new low volume wastewater pond.

## **Notice**

The Applicant notified its customers of the application for the proposed loans by having notice published in the *Arizona Daily Star/Tucson Citizen* on January 6, 2005 and in the *Kingman Daily Miner* on January 7, 2005. A copy of the notice is attached.

## **Background**

AEPCO is a non-profit electric generation cooperative that supplies all or most of the power needs of its five Arizona Class A member distribution cooperatives. These members use this power to meet the electricity needs of their retail member owners in rural areas of Arizona.

In August 2001, AEPCO spun off two entities: Southwest Transmission Cooperative, Inc. ("SWTCO") that owns and operates transmission lines formerly owned and operated by AEPCO, and Sierra Southwest Cooperative, Inc. that provides personnel services to both AEPCO and SWTCO.

Pursuant to an Aquifer Protection Permit by the Arizona Department of Environmental Quality ("ADEQ"), the Applicant plans to close its inactive combustion waste disposal facility and build a low volume wastewater pond at Apache Station.

The Applicant filed a rate case on July 23, 2004 (Docket No. E-01773A-04-0528).

## **Purpose of the Financing**

The purpose of the proposed \$4.9 million CFC loan is to finance the closure of the inactive combustion waste disposal facility at AEPCO's Apache generating station. The Applicant estimates that the closure of this facility will cost about \$4.3 million. The remaining \$600,000 would be used to purchase a capital term certificate as required by CFC. This capital term certificate is refundable upon payment of the note.

The purpose of the \$3,050,000 proposed FFB loan is to finance the construction of a low volume waste water pond at Apache Station in accordance with the Aquifer Protection Permit.

While waiting for the funds from the FFB loan to become available to AEPCO, the Applicant is also requesting approval of a \$3.5 million interim CFC loan (\$3,050,000 will be used to finance the construction and about \$450,000 will be used to acquire the CFC capital term certificate). This interim loan would allow AEPCO to start the construction as promptly as possible.

### **Engineering Analysis**

Staff visited AEPCO's Apache Power Plant to ascertain the operational status of facilities contained in the AEPCO financing and rate application (Docket No. E-01773A-04-0528) cases pending before the Commission. Staff found that the inactive ash pond is no longer "used and useful" and, therefore, is appropriately being retired in 2005. A new low volume waste water evaporation pond is needed once the old combustion waste disposal facility is retired to comply with ADEQ and Arizona Department of Water Resources ("ADWR") requirements. Staff finds the cost of these facility improvements as reported in AEPCO's financing application to be reasonable and appropriate.

### **Description of Proposed Financing**

The term of the proposed \$4.9 million CFC loan would be 10 years. The interest rate on this loan will be determined by the published CFC ten (10) year long-term debt rate at the time of the loan issuance. The rate was 6.25 percent as of December 7, 2004. No pre-payment penalties are applicable for this proposed CFC loan.

Two years is the maximum term of the proposed \$3.5 million interim CFC loan. The Applicant plans to replace this interim financing with a \$3,050,000 FFB loan when the FFB funds become available. The principal on the proposed \$3.5 million interim CFC loan is to be repaid upon draw of the permanent proposed \$3,050,000 FFB loan. The interim CFC loan interest rate will be the published CFC long-term variable rate at the time of the loan issuance. The published CFC long-term variable rate, which fluctuates, was 4.20 percent as of December 7, 2004.

The term of the proposed \$3,050,000 FFB loan would be 30 years with a two-year principal deferment based upon a maturity of December 31, 2035. The interest rate is established daily by the United States Treasury (based on the average yield on outstanding marketable obligations of the United States having a final maturity comparable to the final maturity of the advance). RUS will add to that rate 1/8 of one percent. The interest rate is determined at the time of each advance.

### **Financial Analysis**

The financial analysis is based on Staff's recommended rates (Docket No. E-01773A-04-0528). Schedule AXR-1, attached, presents selected financial information reflecting Staff's recommended rates and pro forma information reflecting the inclusion of the estimated \$4.9 million CFC loan at 6.25 percent per annum and the estimated permanent \$3,050,000 FFB loan



at a 4.77 percent per annum. Schedule AXR-1 also presents adjusted and pro forma operating income, debt service coverage ratio ("DSC"), times interest earned ratio ("TIER") and capital structure.

AEPCO's capital structure before the proposed CFC and FFB loans is composed of 6.3 percent short-term debt, 89.7 percent long-term debt and 4.0 percent equity. The Applicant's capital structure after the proposed CFC and FFB loans would be composed of 6.3 percent short-term debt, 89.9 percent long-term debt, and 3.8 percent equity. The Applicant's capital structure is excessively leveraged. AEPCO should improve its patronage equity position.

Debt service coverage ratio represents the number of times internally generated cash will cover required principal and interest payments on long-term debt. A DSC greater than 1.0 indicates that operating cash flow is sufficient to cover debt obligations.

Times interest earned ratio represents the number of times operating income will cover interest expense on a long-term debt. A TIER greater than 1.0 means that operating income is greater than interest expense. A TIER less than 1.0 is not sustainable in the long-term, but does not necessarily mean that debt obligations cannot be met in the short-term.

Schedule AXR-1, column B, reflects the pro forma effect of the proposed CFC and FFB loans on the Applicant's financial ratios with Staff's adjusted test year operating income (Docket No. E-01773A-04-0528). The proposed \$4,900,000 CFC loan (at 6.25 percent per annum) and the proposed permanent \$3,050,000 FFB loan (at 4.77 percent per annum) would produce a TIER of 0.78 and a DSC of 0.65. These pro forma ratios indicate that AEPCO would not have adequate earnings and cash flows to meet all obligations.

Schedule AXR-1, column D, reflects the pro forma effect of the proposed CFC and FFB loans on the Applicant's financial ratios with the revenues recommended in the rate case (AEPCO and Staff agree on the revenue requirement). The proposed \$4,900,000 CFC loan (at 6.25 percent per annum) and the proposed permanent \$3,050,000 FFB loan (at 4.77 percent per annum) would produce a TIER of 1.54 and a DSC of 1.01. These pro forma ratios indicate that AEPCO would have earnings and cash flows to meet all obligations.

### **Compliance**

As of June 14, 2005, there were no compliance issues with the Commission.

### **Conclusion and Recommendations**

Staff concludes that a finding that issuance of long-term debt for \$4.9 million to close the inactive combustion waste disposal facility on the terms described in the filing is for lawful purposes, within the corporate powers of the Applicant and compatible with the public interest can only be made 1) if AEPCO adopts a plan to improve its capital structure in the near future and 2) Applicant/Staff agreed upon revenue requirement in the rate case is in effect.

Staff concludes that a finding that issuance of the interim debt for \$3.5 million on the terms described in the filing is for lawful purposes, within the corporate powers of the Applicant and compatible with the public interest can only be made 1) if AEPCO adopts a plan to improve its capital structure in the near future and 2) Applicant/Staff agreed upon revenue requirement in the rate case is in effect.

Staff concludes that a finding that issuance of long-term debt for \$3,050,000 to finance the construction of a low volume waste water pond on terms described in the filing is for lawful purposes, within the corporate powers of the Applicant and compatible with the public interest can only be made 1) if AEPCO adopts a plan to improve its capital structure in the near future and 2) Applicant/Staff agreed upon revenue requirement in the rate case is in effect.

Staff recommends the approval of AEPCO's request for authorization to obtain long-term financing on the terms and conditions described in the application in the amount of \$4.9 million contingent upon the Commission's approval of the proposed/recommended revenues in the rate case and also subject to the Applicant committing to adopt a plan concurrent with its rate case to improve its capital structure by increasing the patronage equity portion to at least 30 percent.

Staff recommends the approval of AEPCO's request for authorization to obtain interim financing on the terms and conditions described in the application in the amount of \$3.5 million contingent upon the Commission's approval of the proposed/recommended revenues in the rate case and also subject to the Applicant committing to adopt a plan concurrent with its rate case to improve its capital structure by increasing the patronage equity portion to at least 30 percent.

Staff recommends the approval of AEPCO's request for authorization to obtain long-term financing on the terms and conditions described in the application in the amount of \$3,050,000 contingent upon the Commission's approval of the proposed/recommended revenues in the rate case and also subject to the Applicant committing to adopt a plan concurrent with its rate case to improve its capital structure by increasing the patronage equity portion to at least 30 percent.

Staff further recommends authorizing the Applicant to execute any documents necessary to effectuate the authorizations granted.

Staff further recommends ordering AEPCO to provide to the Utilities Division Compliance Manager copies of all executed financing documents within 60 days after the loan agreement is signed.

FINANCIAL ANALYSIS

Selected Financial Data  
Including Immediate Effects of the Proposed Debt

	[A] AEPCO's Adjusted Test Year <sup>a</sup>	[B] Pro Forma <sup>b</sup>	[C] AEPCO's proposed Rates <sup>c</sup>	[D] Pro Forma <sup>b</sup>
1 Operating Income	\$ 10,425,443	\$ 10,425,443	\$ 21,181,890	\$ 21,181,890
2 Depreciation & Amort.	\$ 7,539,289	\$ 7,539,289	\$ 7,539,289	\$ 7,539,289
3 Income Tax Expense	\$ -	\$ -	\$ -	\$ -
4				
5 Interest Expense	\$ 13,313,164	\$ 13,755,512	\$ 13,313,164	\$ 13,755,512
6 Repayment of Principal	\$ 14,360,494	\$ 14,778,778	\$ 14,360,494	\$ 14,778,778
7				
8				
9 TIER				
10 [1+3] + [5]	0.78	0.76	1.59	1.54
11 DSC				
12 [1+2+3] + [5+6]	0.65	0.63	1.04	1.01
13				
14				
15 As of November 1, 2004				
16 Short-term Debt	\$ 14,360,494	\$ 14,778,778	\$ 14,360,494	\$ 14,778,778
17			6.3%	6.3%
18 Long-term Debt	\$ 204,549,441	\$ 212,531,156	\$ 204,549,441	\$ 212,531,156
19			89.7%	89.7%
20 Common Equity	\$ 9,048,409	\$ 9,048,409	\$ 9,048,409	\$ 9,048,409
21			4.0%	4.0%
22 Total Capital	\$ 227,958,344	\$ 236,358,344	\$ 227,958,344	\$ 236,358,344
23				

<sup>a</sup> Reflects Staff's adjusted test year. See Docket No. E-01773A-04-0793

<sup>b</sup> Reflects effects of the proposed \$4.9 million long-term CFC loan and the proposed \$3,050,000 long-term FFB loan.

<sup>c</sup> Reflects AEPCO's recommended rates. See Docket No. E-01773A-04-0793

# Memorandum

**Date:** February 23, 2005  
**To:** File  
**From:** Jerry D. Smith, Electric Utility Engineer  
**Subject:** AEPCO Site Visit – December 9, 2004

Docket No. E-01773A-04-0793

AEPCO filed an application on November 4, 2004 seeking financing approval from the Arizona Corporation Commission (“ACC” or “Commission”) for two projects:

- a) \$4.9 million to finance permanent closure of its old Combustion Waste Disposal Facility (“CWDF”) or ash pond and
- b) \$3.5 million of interim financing for a new Low Volume Waste Water (“LVWW”) evaporation pond. This interim financing is to be replaced by a permanent loan not to exceed \$3,050,000.

The following documents my assessment of the associated AEPCO’s generation facilities during a recent site visit. It documents the inactive ash pond and other water facilities. Photos taken during this visit are attached as exhibits to document what was observed in the field regarding the subject power plant facilities.

I visited with Arizona Electric Power Cooperative (“AEPCO”) and Southwest Transmission Cooperative (“SWTC”) personnel on December 9, 2004. The purpose of the visit was to tour the Apache Power Plant to ascertain the operational status of facilities contained in AEPCO financing and rate application cases pending before the Commission. Gary Grim served as my host throughout the entire visit. We were joined by Mark Schwartz and Charles Walling for the Apache Power Plant tour.

## Plant Water Facilities

Exhibit 1 depicts all of the major water facilities appurtenant to operation of a power plant. Figure 1 depicts a CWDF constructed north of the plant site in 1995. Meanwhile, Figure 2 shows the location of the old inactive CWDF or ash pond east of the plant site. Cooling towers in operation and use for the plant are depicted in Figures 3 through 5. A water supply tank and tower is also depicted in Figure 3.

The inactive ash pond is no longer “used and useful” and therefore is appropriately being retired in 2005. A new LVWW for impoundment and evaporation of low flow volume wastewater and storm water is needed when the old CWDC is retired. The ash pond is being retired and replaced with a new LVWW pond in accordance with Arizona Department of Environmental Quality (“ADEQ”) and Arizona Department of Water Resources (“ADWR”) requirements.

All other water facilities were observed to be operational, in use and adequately maintained. Therefore, I conclude, with the exception of the inactive ash pond, the subject AEPCO power plant facilities are “used and useful.”

JDS/js

Attachment: Exhibits 1-4

cc: Ernest Johnson, Utilities Director

Steve Olea, Assistant Utilities Director

Del Smith, Engineering Supervisor



EXHIBIT 1  
Water Facilities

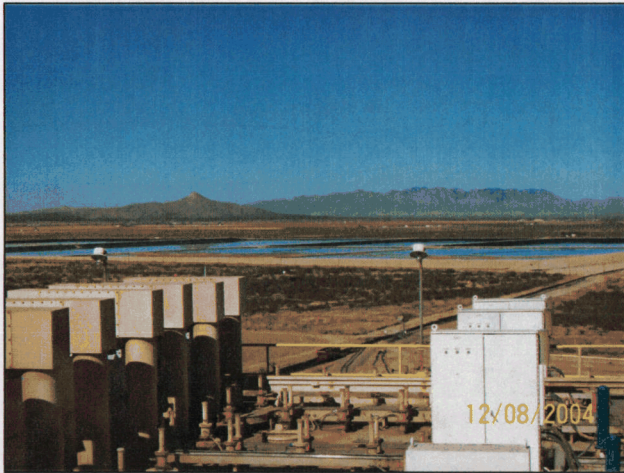


Figure 1. New Cooling Water Ponds



Figure 2. Inactive Ash Pond

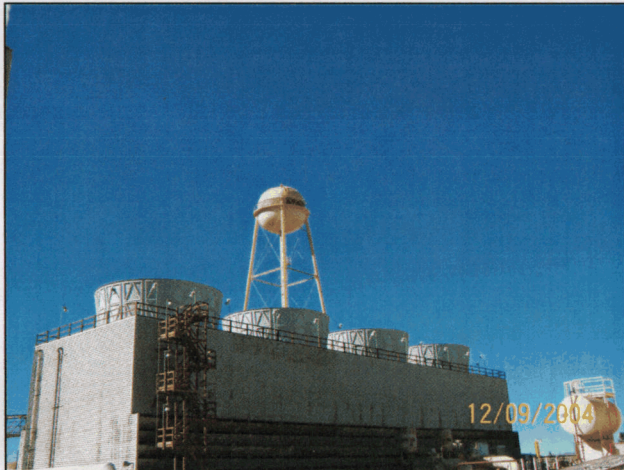


Figure 3. Water Supply Tank



Figure 4. Pair of Cooling Towers East of Plant

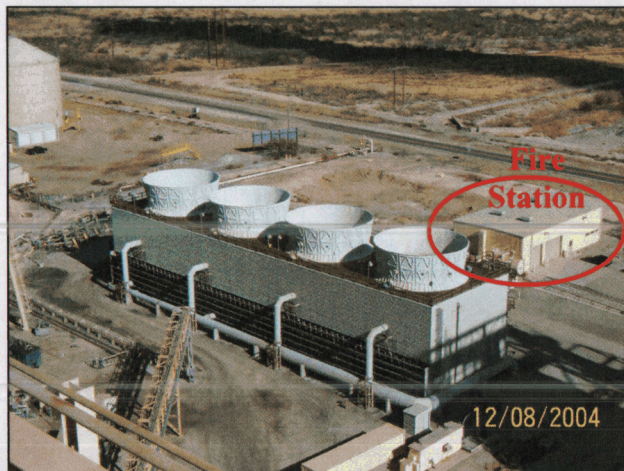


Figure 5. New Cooling Tower





**NOTICE OF  
FINANCE APPLICATION**

On November 4, 2004, the Arizona Electric Power Cooperative, Inc. ("AEP") filed an application for financing approval with the Arizona Corporation Commission (the "Commission"). AEP seeks Commission approval to borrow (a) an amount not to exceed \$4.9 million to finance the closure of the inactive Combustion Waste Disposal Facility at its Apache Generating Station and (b) interim and permanent amounts not to exceed \$3.5 million and \$3.05 million, respectively, to finance the construction of a new Low Volume Wastewater Pond at Apache. Copies of the Application are available at the Commission's offices for public inspection during regular business hours and at AEP's offices at 1000 South Highway 80, Benson, Arizona 85602.

The granting of motions to intervene shall be governed by A.A.C. R14-3-105. Persons desiring to intervene must file a written motion to intervene with the Commission, which motion should be sent to AEP or its counsel and to all parties of record, and which, at a minimum, shall contain the following: (1) the name, address and telephone number of the proposed intervenor; (2) a short statement of the proposed intervenor's interest in the proceeding; and (3) a statement certifying that a copy of the motion has been mailed to AEP or its counsel and to all parties of record in the case.

If you wish to make written comments objecting to or supporting the application, mail them to:

Arizona Corporation  
Commission  
Attention: Docket Control  
Re: Arizona Electric Power  
Cooperative, Inc.  
Docket No. E-01773A-04-0793  
1200 West Washington  
Street  
Phoenix, Arizona 85007

If you have any questions about this application, or want further information on intervention, you may contact the Consumer Services Section of the Commission at the above address or call 1-800-222-7000.

The Commission does not discriminate on the basis of disability in admission to its public meetings. Persons with a disability may request a reasonable accommodation such as a sign language interpreter, as well as request this document in an alternative format, by contacting Yvonne McFarlin at YMcFarlin@admin.cc.state.az.us, the ADA Coordinator, voice phone number 602-542-3931. Requests should be made as early as possible to allow time to arrange the accommodation.  
Publish January 6, 2005  
The Arizona Daily Star  
Tucson Citizen

**STATE OF ARIZONA  
COUNTY OF PIMA**

Janice Anderson, being first duly sworn,  
upon oath deposes and says:

That he/she is the agent of TUCSON NEWSPAPERS, publishers of  
**THE ARIZONA DAILY STAR / TUCSON CITIZEN**,  
newspapers of general circulation in the County of Pima, State of Arizona,  
published at Tucson, Arizona, and that the statement hereto attached is a true representation  
of the advertisement published in the said paper(s) 1 times on the  
following days:

Jan 6 2005 in class 918 T-Tucson Classifieds - Daily

Janice Anderson  
Agent

Subscribed and sworn to before me this

6th day of January, A.D. 2005



VALERIE S. GONZALES  
Notary Public - Arizona  
Pima County  
Expires 09/30/06

My Commission Expires

Notary Public

Valerie S. Gonzales

M6342213201

# AFFIDAVIT OF PUBLICATION

## Kingman Daily Miner

3015 Stockton Hill Road, Kingman, AZ 86401

web: www.kingmandailyminer.com • e-mail: legals@kingmandailyminer.com

Phone (928) 753-6397, ext. 242 • Fax (928) 753-5661

"Serving Kingman since 1882"

STATE OF ARIZONA     )  
County of Mohave     ) ss.

I, **Michelle Sullivan**, being first duly sworn on her oath says:  
That she is the Legals Clerk of THE KINGMAN DAILY MINER  
An Arizona corporation, which owns and publishes the Miner,  
a Daily Newspaper published in the City of Kingman, County of Mohave,  
Arizona; that the notice attached hereto, namely,

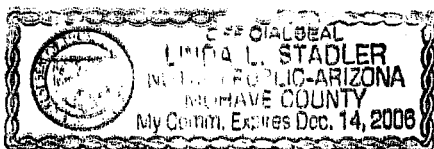
### Notice of Finance Application No. 1416

Has, to the personal knowledge of affiant, been published in the news-  
paper aforesaid, according to law, on the 7th day of January, 2005.  
01/07/2005.

By Michelle Sullivan  
Legal Clerk, 12th Day of January, 2005

By: Linda L. Stadler  
Notary Public

My commission expires: 12/14/2006



(1416)

**NOTICE OF FINANCE APPLICATION**  
On November 4, 2004, the Arizona Electric Power Cooperative, Inc. ("AEP CO") filed an application for financing approval with the

Arizona Corporation Commission (the "Commission"). AEP CO seeks Commission approval to borrow (a) an amount not to exceed \$4.9 million to finance the closure of the inactive Combustion Waste Disposal Facility at its Apache Generating Station and (b) interim and permanent amounts not to exceed \$3.5 million and \$3.05 million, respectively, to finance the construction of a new Low Volume Wastewater Pond at Apache. Copies of the Application are available at the Commission's offices for public inspection during regular business hours and at AEP CO's offices at 1000 South Highway 80, Benson, Arizona 85602.

The granting of motions to intervene shall be governed by A.A.C. R14-3-105. Persons desiring to intervene must file a written motion to intervene with the Commission, which motion should be sent to AEP CO or its counsel and to all parties of record, and which, at a minimum, shall contain the following: (1) the name, address and telephone number of the proposed intervenor; (2) a short statement of the proposed intervenor's interest in the proceeding; and (3) a statement certifying that a copy of the motion has been mailed to AEP CO or its counsel and to all parties of record in the case.

If you wish to make written comments objecting to or supporting the application, mail them to:

Arizona Corporation Commission  
Attention: Docket Control  
Re: Arizona Electric Power Cooperative, Inc.  
Docket No. E-01773A-04-0793  
1200 West Washington Street  
Phoenix, Arizona 85007

If you have any questions about this application, or want further information on intervention, you may contact the Consumer Services Section of the Commission at the above address or call 1-800-222-7000.

The Commission does not discriminate on the basis of disability in admission to its public meetings. Persons with a disability may request a reasonable accommodation such as a sign language interpreter, as well as request this document in an alternative format, by contacting Yvonne McFarlin at YMcFarlin@admin.cc.state.az.us, the ADA Coordinator, voice phone number 602-542-3931. Requests should be made as early as possible to allow time to arrange the accom-

modation.  
1/7/2005, No. 1416